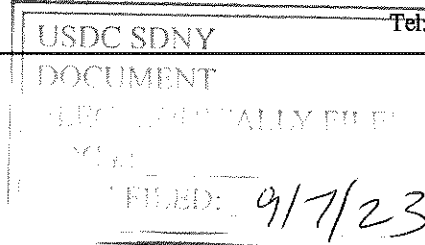


Federal Defenders
OF NEW YORK, INC.

Southern District
81 Main Street, Suite 300
White Plains, N.Y. 10601-4150
Tel: (914) 428-7124 Fax: (914) 948-5109

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge



Sept. 7, 2023

The Hon. Victoria Reznik
United States Magistrate Judge
United States Courthouse
300 Quarropas St.
White Plains, NY 10601

APPLICATION GRANTED

Hon. Victoria Reznik, U.S.M.J.

Re: *United States v. Jeff Tognetti*, Case No. 23-cr-453 (NSR)

Dear Judge Reznik,

I am writing to request that the Court modify the terms of Mr. Tognetti's release to permit him an extra week to fulfill his bond conditions. The government has no objection.

On August 31, 2023, the Court, the Honorable Andrew Krause presiding, released Mr. Tognetti on an agreed-upon bail package that included an unsecured \$100,000 bond signed by two financially responsible people (FRP) by today, September 7, 2023. Yesterday, defense counsel learned that the United States Attorney's Office is now requiring the following documents before interview FRP candidates: passport, driver's license, W-2, bank statements, mortgage statement, last 2 paystubs, proof of current address, if different from driver's license, and immigration documents, if applicable

In the past, we have been able to conduct interviews (and receive USAO approval) with only identification, a recent bank statement, and a pay stub. Given this apparent change in protocol, Mr. Tognetti's potential FRPs need additional time to retrieve and submit these documents. As such, he requests an additional week (until September 14, 2023) to fulfill his bond conditions.

Thank you for your consideration of this request.

Sincerely,

Rachel Martin
Assistant Federal Defender

cc: AUSA Jennifer Ong
U.S. Pretrial Services Officer Andrew Abbott